REMARKS

Claims 1-3 and 5-14 are pending. Claims 8-10 have been withdrawn from consideration. By this response, claims 1-7 and 11 are amended, claims 13 and 14 added and claim 4 canceled. Reconsideration and allowance based on the above amendments and following remarks are respectfully requested.

Applicants appreciate the indication that claims 6 and 7 as containing allowable subject and would be allowable if rewritten in independent form to include limitations of their base claim and any intervening claims. Applicants note that claim 6 has been amended to include the features of it's independent claim 1 and intervening claim 4. Accordingly, claim 6 is now in condition for allowance.

The Office Action rejects claims 1-5, 11 and 12 under 35 U.S.C. § 103(a) as being unpatentable over Showen et al. (U.S. Patent No. 5,973,998) in view of Millikin (U.S. Publication No. 2005/0117454) and Pahlavan et al. ("An Overview of Wireless Indoor Geolocation Techniques and Systems). This rejection is respectfully traversed.

Claim 1 recites, *inter alia,* a device for forming a combination of segments of said output of said first sensor, the segments being staggered with respect to each other by intervals corresponding to the delays between the events in the output of the second sensor, and a determination device for determining said time delay from the position of a feature within said combination.

Claim 11 recites, *inter alia,* a calculation device for (a) deriving at least two time measurements each representing the difference in time between a signal produced by a respective one of the sensors and a similar signal produced by a different one of the sensors, and (b) for calculating the location of the object in dependence upon the time measurements; wherein each time measurement is derived by: combining multiple segments of the signal from the respective sensor, the segments being staggered by intervals which correspond to the intervals between predetermined events occurring in the signal generated by said different sensor, and determining

the position within the combination of a predetermined feature of which the Office Action states contains allowable subject matter.

In embodiments of the present invention as recited in independent claims 1 and 11, a time measurement is determined by combining multiple segments of a signal from a sensor, the segments being staggered by intervals which correspond to the intervals between events occurring in the signal generated by a different sensor. Applicants respectfully submit that the above features of independent claims 1 and 11 are not taught by Showen, Millikin and Pahlavan.

Showen teaches a system that determines a location of gunfire or explosions. Showen's system relies upon a triangulation means using at least three sensors to determine the location. Showen, however, does not teach or suggest staggering signals of segments of signal by intervals from which a time measurement is determined by combining multiple segments.

Millikin teaches an acoustic location system in which time difference of arrival (TDOA) is used to determine the location of an acoustic wave. The system employs various sensors to detect the acoustic wave. Due to the time delay of the acoustic wave received at the different sensors, the sensors detect the acoustic wave at different times. The acoustic wave is received at the sensors are processed by a processing system which associates the relative timing position of each of the received acoustic wave signals. The signals can then be used to determine a location of the sound. See paragraphs 28-31. Millikin, however, does not teach or suggest staggering signals of segments of signal by intervals from which a time measurement is determined by combining multiple segments.

Finally, Pahlavan teaches a basic concept of different types of methods of obtaining a location from a signal. Specifically, Pahlavan asserts that anyone of Angle of Arrival (AOA), Time of Arrival (TOA), Time Differences of Arrival (TDOA), Received Signal Strength (RSS) and Received Signal Phase can be used to determine a location of a signal. Pahlavan, however, does not teach or suggest staggering signals of segments of signal by intervals from which a time measurement is determined by combining multiple segments.

Thus, Applicants respectfully submit that neither of the references individually or in combination teach or suggest the above recited features of independent claims 1 and 11. Therefore, in view of the absence of teachings of each of the claimed features by the combination of references, Applicants respectfully request reconsideration and withdrawal of the rejection.

Conclusion

For at least these reasons, it is respectfully submitted that Claims 1-3 and 5-14 are distinguishable over the cited art. Favorable consideration and prompt allowance are earnestly solicited.

Should there be any outstanding matters that need to be resolved in the present application, the Examiner is respectfully requested to contact Chad J. Billings (Reg. No. 48,917) at the telephone number of the undersigned below, to conduct an interview in an effort to expedite prosecution in connection with the present application.

If necessary, the Commissioner is hereby authorized in this, concurrent, and future replies, to charge payment or credit any overpayment to Deposit Account No. 02-2448 for any additional fees required under 37 C.F.R. §§ 1.16 or 1.17; particularly, extension of time fees.

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Respectfully submitted,

By_____

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